October 19, 2011

Marlene H. Dortch Secretary Federal Communications Commission 445 12th Street, SW Washington, DC 20554



Re: WC Docket No. 11-42; WC Docket No. 03-109; CC Docket No. 96-45

Dear Ms. Dortch:

On October 17, 2011, I spoke with Margaret McCarthy of Commissioner Copps' Office spoke by telephone.

I reviewed some of the UCC's most important concerns in the Lifeline proceeding. Most important, I stressed that we hope that the Commission will allocate some of the cost-savings in the high cost Universal Service program to the low income program. UCC OC Inc. is very concerned that the Lifeline program may not be expanded to support broadband services.

UCC OC Inc. opposes a cap on the Lifeline program or any policy proposal that had an impact similar to a cap. Ms. Leanza also emphasized she hoped to see expansive pilot projects in the Lifeline program that will address other reasons besides cost that low-income people do not adopt broadband. As part of the Leadership Conference on Civil and Human Rights, UCC OC Inc. had supported a \$50 million funding level for broadband pilots. I suggested the Commission use some funds from the savings and efficiencies in the high cost fund to help pay for the pilot programs. However, if the full Lifeline program is not going to support broadband, \$50 million would be a very low sum of money to address the broadband adoption gap.

I emphasized that if the high cost fund can be expanded to broadband, the Lifeline program should also be expanded to broadband. I referenced the recent comments of Blair Levin who has been emphasizing the need to address the adoption gap with many more resources than are currently being put toward adoption.

Sincerely,

Chervl A. Leanza

Policy Advisor, United Church of Christ, OC Inc.